

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

ALEXIS WELLS)	
)	
Plaintiff and Counter-Defendant,)	
)	
vs.)	CASE NO: 3:21-cv-47-JRS-MPB
)	
THE FREEMAN COMPANY, and)	
TIMOTHY VAUGHN, individually,)	
)	
Defendants and Counter-Plaintiff)	

PLAINTIFF’S FINAL EXHIBIT LIST

The Plaintiff, Alexis Wells (hereinafter “Wells” or “Lexi” or “Plaintiff”), by counsel, submits her final list of exhibits she may rely upon at the trial of this matter. Because however, discovery motions are still pending before the Court and expert depositions have not been completed, this list may change to reflect this discovery and so therefore, Plaintiff reserves the right to amend and supplement her final witness and exhibit lists accordingly. Also, it is expected that Plaintiff and Defendants will be filing pretrial motions, including Daubert motions and motions in limine, and rulings thereon may impact the need for and relevance and admissibility of certain of the following documents.

Exhibits

1. Lloyd Ellis deposition transcript, Volume 1 and 2, September 29, 2021 and March 9, 2022.
2. Lloyd Ellis Video deposition September 29, 2021
3. Tim Vaughn deposition transcript Volume 1 and 2, April 1 and 18, 2022
4. Tim Vaughn Video deposition April 1 and 18, 2022

5. Drake Oldham deposition transcript, April 19, 2022
6. Lexi Wells deposition transcript, May 4, 2022
7. Jasmine Quinones deposition transcript, May 17, 2022
8. Clay Cook deposition transcript, May 18, 2022
9. Robbie Arnold deposition transcript, May 19, 2022
10. The Freeman Company Oral 30(b)(6) deposition transcript, May 20, 2022
11. Tim Vaughn/ Lloyd Ellis Text Messages, Wells-00443 [Dep. Ex. 6]
12. Tim Vaughn/ Lloyd Ellis Text Messages, PLF000462-63 [Dep. Ex. 10]
13. Lloyd Ellis Text Message, PLF000434 [Dep. Ex. 11]
14. James Wells/Tim Vaughn/Julie Wells Text Messages, Vaughn000004 [Dep. Ex. 12]
15. Headwaters Receipt, Wells-00458 [Dep. Ex. 13]
16. Tobias Receipt [Dep. Ex. 14]
17. Headwaters Receipt [Dep. Ex. 15]
18. A Land Remembered Receipt, Wells-00468 [Dep. Ex. 17]
19. Shingle Creek Receipt, Wells-00462 [Dep. Ex. 17]
20. Headwaters Receipt, [Dep. Ex. 19]
21. Renegade Entertainment Invoice, Wells-00483, [Dep. Ex. 20]
22. Ellis Handwritten List of Events [Dep. Ex. 21]
23. Ellis Freeman Employee Profile, Wells-09141 [Dep. Ex. 22]
24. Text Messages [Dep. Ex. 23]
25. Ellis Resume, Wells 09024-28 [Dep. Ex. 24]
26. Invoice, Wells-09125 [Dep. Ex. 25]
27. Event Detail, Ellis 000468-000516 [Dep. Ex. 26]

28. Event Info, Ellis 000466 [Dep. Ex. 27]
29. Estimated Revenue, Ellis 000467 [Dep. Ex. 28]
30. Labor Workbook, Ellis 000420-423 [Dep. Ex. 29]
31. Email, Wells-03818 [Dep. Ex. 32]
32. Email Chain, Wells-03348-03349 [Dep. Ex. 33]
33. Email Chain, Wells-02932-37 [Dep. Ex. 34]
34. Email, Wells-03191 [Dep. Ex. 35]
35. Email Chain, Wells-03395-97 [Dep. Ex. 36]
36. Email Chain, Wells-01500-01502, [Dep. Ex. 37]
37. Precon Checklist, Wells-02537-41 [Dep. Ex. 38]
38. Email Chain, Wells-03897-901 [Dep. Ex. 42]
39. Email, Wells-04182 [Dep. Ex. 43]
40. Payroll Sheets, Ellis 000440-446 [Dep. Ex. 44]
41. Receipts, Ellis 000412-416 [Dep. Ex. 50]
42. Invoice, Wells-00931 [Dep. Ex. 51]
43. Email, Ellis 000180-181 [Dep. Ex. 52]
44. Freeman Company Code of Conduct, Wells-00559-575, [Dep. Ex. 53]
45. Email, Ellis 000170-000172 [Dep. Ex. 54]
46. Email Chain, Ellis 000168-169 [Dep. Ex. 55]
47. Email, Ellis 000159-161 [Dep. Ex. 56]
48. Email Chain, Ellis 000142-146 [Dep. Ex. 57]
49. Email Chain, Wells-09527-09530 [Dep. Ex. 58]
50. Client Solutions Manager Job Description, Wells-00555-558 [Dep. Ex. 59]

51. Vaughn Freeman Employee History, Wells-00905-910 [Dep. Ex. 60]
52. Freeman Job Description Technical Solutions Mgr., Wells-00723-725 [Dep. Ex. 61]
53. Your 2016 Statement, Wells-00916 [Dep. Ex. 62]
54. Your 2017 Statement, Wells-000917 [Dep. Ex. 63]
55. Your 2018 Total Rewards Statement, Wells-00918 [Dep. Ex. 64]
56. Your Total Rewards Statement, Wells-00912 [Dep. Ex. 65]
57. Notice Of Employment Termination, Vaughn000132-146 [Dep. Ex. 66]
58. FY16 Mid-Year For Timothy Vaughn, Wells-00830-831 [Dep. Ex. 67]
59. FY16 Employee Performance Appraisal For Vaughn, Wells-00823-829 [Dep. Ex. 68]
60. FY17 Employee Performance Appraisal For Vaughn, Wells-00832-839, Dep. Ex. 69]
61. FY18 Mid-Year For Timothy Vaughn, Wells-00852-853 [Dep. Ex. 70]
62. FY18 Employee Performance Appraisal For Vaughn, Wells-00841-851 [Dep. Ex. 71]
63. Performance Improvement Plan, Wells-00923-925 [Dep. Ex. 77]
64. FY19 Mid-Year For Timothy Vaughn, Wells-00861-862 [Dep. Ex. 73]
65. FY19 Employee Performance Appraisal For Vaughn, Wells-00854-860 [Dep. Ex. 74]
66. Employee Handbook, Wells-00586-00666 [Dep. Ex. 75]
67. “Details” sheet of the Wells-00813 document [Dep. Ex. 76]
68. Request For Proposal, Wells-09042 [Dep. Ex. 77]
69. E-Mail Chain, Wells-00404-428 [Dep. Ex. 78]
70. File Produced Natively, Freeman Rates, Wells-08937 [Dep. Ex. 79]
71. E-Mail Chain, Wells-00342 - 00346 [Dep. Ex. 80]
72. Veeva Fy21 Field Kickoff Orlando - Hyatt, Wells-00162 - 00173 [Dep. Ex. 81]
73. Veeva Fy21 Field Kickoff Orlando - Hilton, Wells-00174 - 00184 [Dep. Ex. 82]

74. E-Mail String, Wells-00265 – 00268 [Dep. Ex. 83]
75. E-Mail String, Wells-06208 – 06209 [Dep. Ex. 84]
76. Worker Classification Review Questionnaire, Wells-10148 – 10164 [Dep. Ex. 85]
77. E-Mail/Documents [Dep. Ex.86]
78. E-Mail String, Wells-05644 – 05645 [Dep. Ex. 87]
79. E-Mail String, Wells-07042 – 07044 [Dep. Ex. 88]
80. Email, Wells-08200 [Dep. Ex. 89]
81. E-Mail, Consulting Agreement, Wells-08114 – 08123 [Dep. Ex. 90]
82. E-Mail, Wells-04321 [Dep. Ex. 91]
83. Invoice, PLF001305 [Dep. Ex. 92]
84. E-Mail String, Wells-01529 – 01532 [Dep. Ex. 93]
85. File Produced Natively, Labor Workbook, Wells-02161 [Dep. Ex. 94]
86. File Produced Natively, Labor Workbook, Wells-02421 [Dep. Ex 95]
87. Text Messages [Dep. Ex. 96]
88. Text Messages, PLF000487 - PLF000488 [Dep. Ex. 97]
89. E-Mail String, Wells-05207 [Dep. Ex. 98]
90. E-Mail, Wells-00320 – 00321 [Dep. Ex. 99]
91. E-Mail, Wells-00443 [Dep. Ex. 100]
92. E-Mail String, Wells-10172 – 10176 [Dep. Ex. 101]
93. E-Mail, Vaughn000196 [Dep. Ex. 102]
94. E-Mail, Wells-10167 -10171 [Dep. Ex. 103]
95. E-Mail String, Wells-05674 – 05677 [Dep. Ex. 104]
96. E-Mail String, Wells-00313 – 00315 [Dep. Ex. 105]

97. E-Mail, Keynote Production & Crew, Wells-00322 – 00323 [Dep. Ex. 106]
98. Text Messages, PLF000488 [Dep. Ex. 107]
99. E-Mail String, Vaughn000189 - 000191 [Dep. Ex. 108]
100. Text Messages [Dep. Ex. 109]
101. Text Messages, PLF000488 - PLF000489 [Dep. Ex. 110]
102. Text Messages, PLF000462 [Dep. Ex. 111]
103. Text Messages [Dep. Ex. 112]
104. Receipt, Wells-00458 [Dep. Ex. 113]
105. Live Photos, PLF000754-55 [Dep. Ex. 114]
106. Text Messages, PLF000489 - 92 [Dep. Ex. 115]
107. Text Messages, PLF000462 – 63 [Dep. Ex. 116]
108. Transcript, PLF000261 – 299 [Dep. Ex. 117]
109. Sealed Document [Dep. Ex. 118]
110. Text Messages, PLF000492 [Dep. Ex. 119]
111. Text Messages, PLF000463 [Dep. Ex. 120]
112. Text Messages [Dep. Ex. 121]
113. E-Mail Communication [Dep. Ex. 126]
114. Expense Report, Wells-00454-00475 [Dep. Ex. 127]
115. E-Mail Communication, Wells-00926-00927 [Dep. Ex. 128]
116. Text Communications, Vaughn000046 [Dep. Ex. 129]
117. Text Communications [Dep. Ex. 130]
118. Text Communications - PLF 000464-PLF 000487 [Dep. Ex. 131]
119. Timothy Vaughn Personal Information, Wells-00886-00910 [Dep. Ex. 132]

120. Separation Agreement & General Release, Wells-00667-00708 [Dep. Ex. 133]
121. Hiring Manager Checklist, Wells-09558-09560 [Dep. Ex. 134]
122. Freeman Employee Forms, Wells-09587-09588, 09592, 09594-09596 [Dep. Ex. 135]
123. Freeman Employee Forms, Wells-00865, 00867, 00872-00874, 00876-00884 [Dep. Ex. 136]
124. Affidavit Of Anne Mantha, PLF 001285-PLF 001293 [Dep. Ex. 137]
125. Model Measurement Guide - PLF 001407-PLF 001412 [Dep. Ex. 138]
126. Text Messages, Vaughn000043-Vaughn000045 [Dep. Ex. 140]
127. Hours Worked, PLF000921 [Dep. Ex. 142]
128. Airline Receipt, PLF001129 [Dep. Ex. 143]
129. New Hire Checklist [Dep. Ex. 144]
130. Text Messages, PLF000811 [Dep. Ex. 145]
131. Incident Report, PLF000080 - 82 [Dep. Ex. 146]
132. Text Messages, PLF000831 [Dep. Ex. 147]
133. Text Messages, PLF000851 [Dep. Ex. 148]
134. Petition For an Order for Protection, PLF000083-90 [Dep. Ex. 149]
135. Orange County Sheriff's Office Statement, PLF000072-76 [Dep. Ex. 150]
136. Petitioner's Answers to Respondent's Request for Admissions, [Dep. Ex. 151]
137. Text Messages, PLF000823 [Dep. Ex. 152]
138. April 6, 2020 Sexual Harassment Complaint, Vaughn000074-191 [Dep. Ex. 155]
139. SAP Concur, Concur Expense self-guided demo [Dep. Ex. 156]
140. The Wells-00813 document [Dep. Ex. 158]
141. The Wells-00813 document Properties [Dep. Ex. 159]

142. The Wells-00813 document image properties [Dep. Ex. 160]
143. The Wells-00813 document [Dep. Ex. 161]
144. EEOC Charge of Discrimination, PLF000351 – 000366 [Dep. Ex. 162]
145. Organizational chart drawn by Cook [Dep. Ex. 165]
146. Senior Client Solutions Manager Summary, Wells-10194 – 10195 [Dep. Ex. 166]
147. Affidavit of Lori Brennan, PLF001238 – 001240 [Dep. Ex. 167]
148. Affidavit of Ishanee DeVas, PLF001192 – 001197 [Dep. Ex. 168]
149. Email, Wells-08378 [Dep. Ex. 169]
150. Email, Wells-05641 - 43 [Dep. Ex. 170]
151. Emails, Wells-01498 - 01499 [Dep. Ex. 171]
152. Emails, Wells-01789 - 01791 [Dep. Ex. 172]
153. Email, Wells-08321 [Dep. Ex. 173]
154. Senior Director-Client Solutions job description, Wells-09568 – 09571 [Dep. Ex. 176]
155. Freeman Job Description, VP-Client Solutions, Wells-09572 – 09575 [Dep. Ex. 177]
156. 4/27/2020 Hart Letter [Dep. Ex. 179]
157. Emails, Wells-00335-00336 [Dep. Ex. 180]
158. Freeman's Statement of Position [Dep. Ex. 181]
159. Freeman Job Description, SVP - Sales, Business Solutions, Wells-10144 - 10147 [Dep. Ex. 184]
160. Freeman Job Description Senior Vice President - Client Solutions [Dep. Ex. 185]
161. Glena and Matt Mullikin's responses to Plf. Non-Party RFP dated February 19, 2022
162. Stephanie Vaughn's Responses to Plf. Non-Party RFP
163. Kristina, Todd and Lilli Burnett's Responses to Plf. Non-Party RFP

164. Emails, Wells-07490 - 7492
165. Emails, Wells-05315 - 5318
166. Emails, Wells-07288 - 7289
167. Email, Wells-07859
168. Emails, Wells-01936
169. Emails, Wells-07326 - 7328
170. Emails, Ellis 000301-03
171. Email, Ellis 000199
172. Email, Wells-00956
173. Emails, Wells-04171 - 4177
174. Emails, Ellis 000187
175. Emails, Wells-07570
176. Emails, Wells-08301 - 8303
177. Email with attachment, Wells-08330 - 8331
178. Email, Wells-08113
179. Emails, Wells-07573
180. Rosen brochure, PLF000001 - 000008
181. A. Wells Hotel Bill, PLF000011
182. T. Vaughn Hotel Bill, PLF000010
183. L. Ellis Hotel Bill, PFL000039
184. Ellis Receipts, PLF000040 - 000041
185. Wire Transfer Documents, PLF000049 - 000050
186. Menus, PLF000053 - 000063

187. Consulting Agreement/Invoices, PLF001296 - 1315, PLF001317 - 1318
188. Payment Voucher, PLF001324
189. Oldham Conversation and Transcript, PLF000260, PLF000261 - 305
190. WKU emails and information, PLF000624 - 753, 75 - 776, 999 - 1000
191. Plf. iPhone Messages, PLF000756 - 921
192. Plf. iPhone Messages, PLF000404 - 623
193. Counseling Records, PLF000066 - 71, PLF000098 - 259, PLF001397 - 1405
194. Receipt, PLF000064
195. Business Card, PLF000065
196. Receipt for Airplane ticket, PLF001129 - 1131
197. Medical Records for Leona Dillingham Freeman produced w/o Bates Numbers on May 10, 2022
198. Julie Wells' response to Freeman Subpoena, JulieWells000001 - 81
199. Dr. Pfeffer's Expert Report
200. Dr. Samuels' Expert Report
201. Photographs produced by Vaughn, Vaughn000372 - 408
202. Email w/ attachment from K. Biesecker dated May 12, 2022
203. Email w/ attachments from K. Biesecker dated June 5, 2022
204. Any and all exhibits necessary for impeachment, rebuttal and surrebuttal purposes, demonstrative purposes, and/or to identify or authenticate an exhibit.
205. Any items listed on Defendants' Exhibit Lists.

Plaintiff at this time does not stipulate to the relevance, authenticity or admissibility of the foregoing. Also, certain of the foregoing documents are confidential pursuant to confidentiality

agreements and/or a Protective Order. Preservation of such confidentiality is not waived and is expressly reserved and maintained for all purposes, including trial.

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of July 2022, a copy of the foregoing was filed electronically. Service will be made electronically on all ECF-registered counsel of record via email generated by the Court's ECF system.

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